ANCHOR ENVIRONMENTAL, L.L.C.

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Memorandum

To: Rear Admiral Richard R. Houck, 13th Coast Guard District Commander

From: Carl Stivers, NW Natural "Gasco" Site Project Coordinator, Anchor Environmental, L.L.C

CC: Sean Sheldrake, USEPA
Robert Wyatt, NW Natural
Patty Dost, Schwabe Williamson & Wyatt
Rick Wadsworth, Parametrix

Date: September 7, 2006

Re: Request for Establishment of Regulated Navigation Area

On behalf of NW Natural, this memo is to request the establishment of a regulated navigation area (RNA) at the NW Natural "Gasco" site (Site) located in the Willamette River in Portland, Oregon. This request is pursuant to the Code for Federal Registration (CFR) Title 33, Part 165. The proposed RNA is to be used to preserve the integrity of the clean engineered pilot cap placed over a portion of the Site remediation area as part of an Environmental Protection Agency (EPA) Superfund cleanup action. This memo proposes to prohibit activities that would cause inappropriate disturbance of the engineered pilot cap material, which was placed to isolate underlying contaminated sediments. The remainder of this memo provides background for this request, the purpose of this request, and information required for proposing a RNA at the Site.

Background and Purpose

The Gasco Site is located within the Portland Harbor Superfund Site at approximately river mile (RM) 6.5 in the Willamette River (Figure 1). NW Natural entered into an Administrative Order on Consent (Order) (EPA 2004) with the U.S. Environmental Protection Agency (EPA) on April 28, 2004 to perform a number of actions associated with removing a tar body (as defined in the Order) at the surface of the nearshore sediment adjacent to the Site. As part of these actions, NW Natural designed and constructed an engineered pilot cap over a portion of the removal action area (Figure 2). The purpose of the engineered pilot cap is to place a barrier over a

portion of the removal area and monitor the performance of the pilot cap until the Portland Harbor Superfund Site Remedial Investigation/Feasibility Study (RI/FS) is completed and a final remedy is evaluated for the Site. The pilot cap monitoring information collected in the interim will be used to help evaluate contaminant loading through the cap due to residual contamination in sediments and/or potential groundwater migration through the cap, and to help determine whether capping might be an effective remedy for future remediation at the Site.

Site remediation consisted of dredging of the identified surface tar body followed by placement of either 18-inches of an engineered pilot cap material or 6-inches of a fringe cover material. The engineered pilot cap encompasses approximately 16,800 sf and is comprised of a 12-inch "cap" layer overlain with a 6-inch "armor" layer. The pilot cap material was selected to be protective for the 25-year flow event (82 percent chance of non-exceedance in a 5-year period) in the river. To successfully monitor the pilot cap performance, it will be necessary to limit potential disturbance of the cap by vessel activity at the Site within the Willamette River. Therefore, NW Natural is requesting an RNA prohibiting activities that will inappropriately disturb the engineered pilot cap material (Figure 2). Note, in the future, EPA may determine that the pilot cap and/or additional underlying contaminated sediment should be removed as part of a future final remediation of the Site, and any RNA established is not intended to restrict such potentially appropriate activities.

Required Information

Specific details, as requested in CFR Title 33 Part 165.5, related to this request are provided below.

(1) Name of the person submitting the request: Carl Stivers, NW Natural "Gasco" Site Project Coordinator, Anchor Environmental, L.L.C. on behalf of NW Natural.

(2) The location and boundaries of the RNA: Location information (northing and easting; coordinates in Washington State Plane South Zone [NAD 83] latitude and longitude) is provided below for the vertices of the engineered pilot cap and are shown on Figure 2 (attached) and Table 1 (below).

(3) Date, Time, and Duration that the RNA should be established: The RNA should be established as soon as possible and last in perpetuity, or until disturbance of the cap is approved by EPA and NW Natural.

Table 1

Coordinates for Gasco Engineered Pilot Cap

Point	Northing[1]	Easting[1]	Latitude[2]	Longitude[2]
1	7624020.54	705540.45	122° 45′ 28.766669″	45° 34′ 47.08817″
2	7623922.29	705597.45	122° 45′ 30.16986″	45° 34′ 47.62087″
3	7623903.15	705618.02	122° 45′ 30.44706″	45° 34′ 47.82136″
4	7623915.31	705690.73	122° 45′ 30.30325″	45° 34′ 48.54425″
5	7623931.04	705717.98	122° 45′ 30.09435″	45° 34′ 48.81563″
6	7624065.17	705640.54	122° 45′ 28.17874″	45° 34′ 48.08834″
7	7624069.29	705625.17	122° 45′ 28.11480″	45° 34′ 47.93778″

Notes:

[1] – The coordinates are in State Plane Oregon State Plane NAD 83 (international ft)

[2] – The coordinates are in NAD 83 (ft) in degrees, minutes and seconds format.

(4) Description of the activities planned for the RNA: As described above, the proposed RNA is an area where an engineered pilot cap layer consisting of sand, gravel and armor material was placed during the NW Natural Gasco Site Early Action remediation project. The engineered pilot cap area is currently not used by NW Natural. However, this area is directly adjacent to an active refueling dock and pipeline that is frequently accessed by refueling barges and tugs. The tenant currently leasing the refueling pipeline (Fuel and Marine Marketing) has been informed of the location of the engineered pilot cap and has been asked to advise all vessel operators accessing the pipeline to minimize potential impacts (e.g., anchoring, vessel scour, wake scour, etc.) to the cap. The engineered pilot cap was designed to withstand the secondary shear stresses created by these vessel activities.

(5) Nature of the restrictions desired: NW Natural requests that the restrictions prohibit activities such as motoring directly over or adjacent to the engineered pilot cap area except as required for ongoing operations at the adjacent refueling pipeline, or anchoring, dragging, trawling, or other activities that involve disrupting the integrity of the cap. No other navigation restrictions are desired.

(6) Reason why the restrictions are desired: EPA has requested that NW Natural seek the RNA to facilitate long-term operations, monitoring and maintenance of the engineered pilot cap required by EPA pursuant to CERCLA.

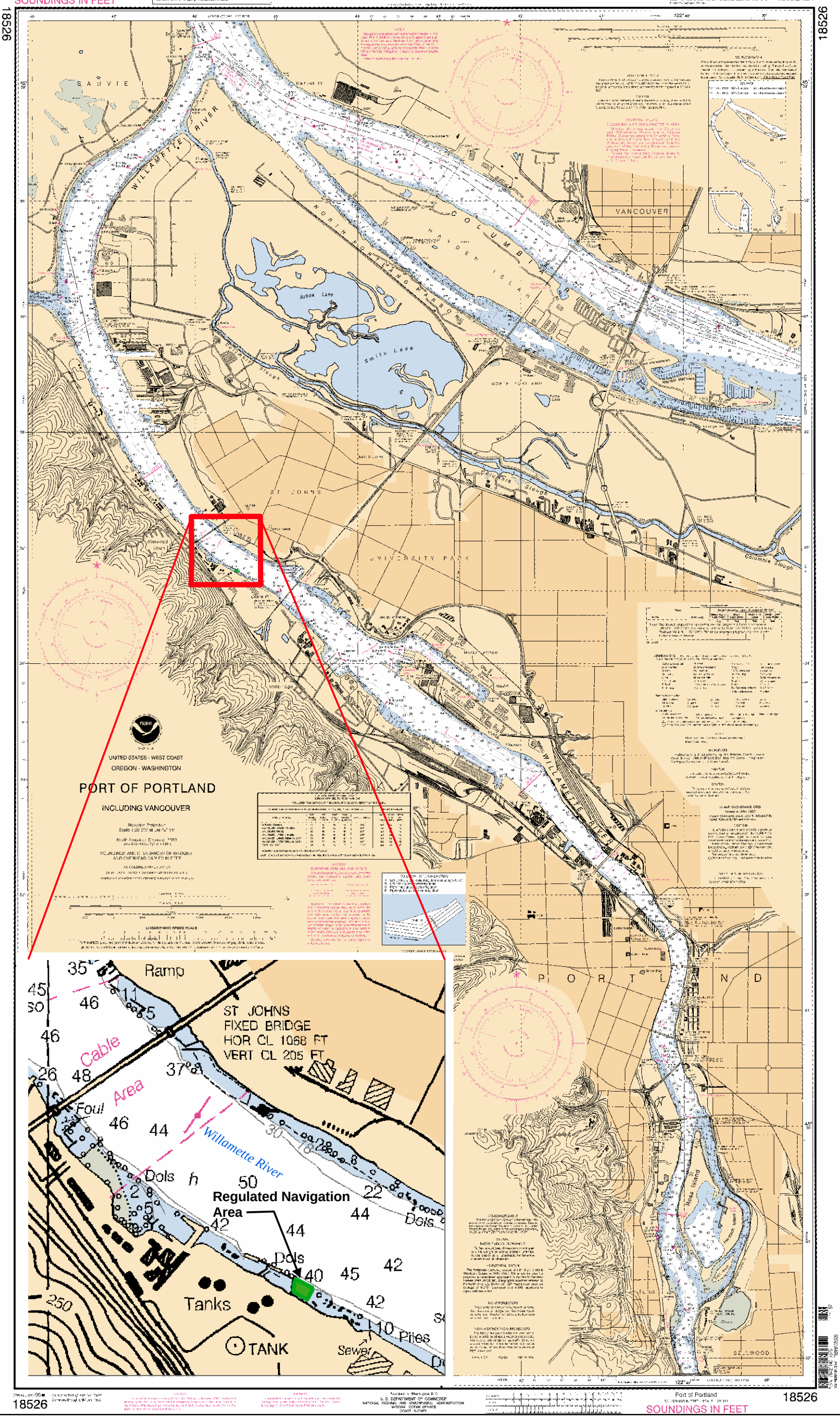
Please provide documentation that this memo has been received and a status update of the rule-making process to establish the RNA. If you need additional information please feel free to contact Carl Stivers at (206) 287-9130 or cstivers@anchorenv.com.

Not For Navigational Use

SOUNDINGS IN FEET

18526

18526



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18526 Port of Portland 18526

SOUNDINGS IN FEET

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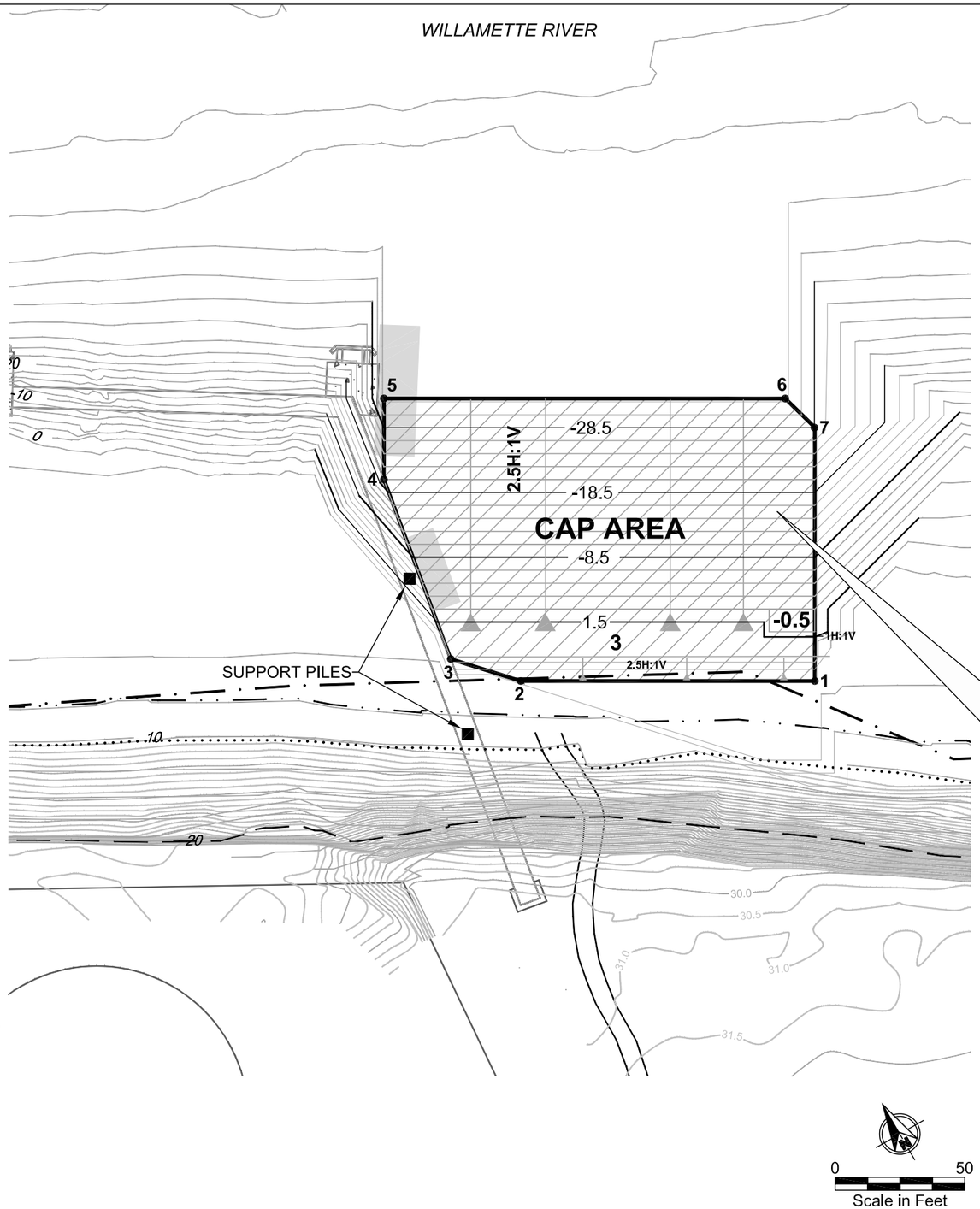
Not to Scale

Figure 1
Site Vicinity Map
NW Natural "Gasco" Site

Legend:

- Support Pile Location
- Design 15' Dredging Offset to Protect Piles
- Property Line
- OHW = 20.41 ft NAVD 88
- OLW = 7.91 ft NAVD 88
- 50% River Stage Elevation = 10.23 ft NAVD 88
- 3 — Design Extent and Elevation of 18 in Thick Cap



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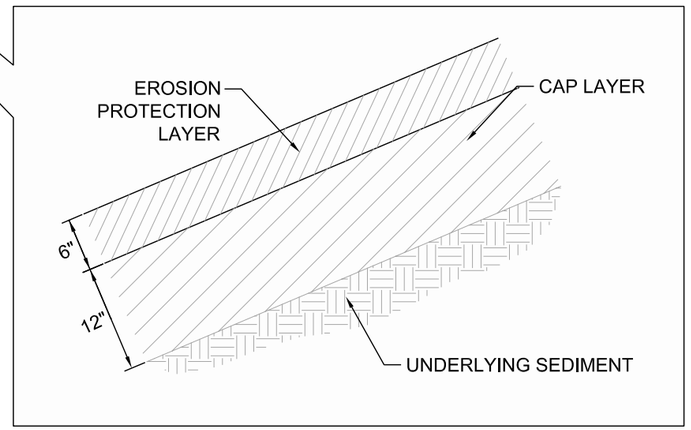
Notes:
1. Coordinate Datum: Oregon State Plane North NAD 83 (ft).
2. Coordinates in NAD 83 (ft) in degrees, minutes, seconds.



Notes:

1. Bathymetric contours provided by the Lower Willamette Group as part of the Portland Harbor Superfund Site study (2003).
2. Upland topography directed by Anchor Environmental as part of upland investigation (2002).
3. Horizontal Datum: Oregon State Plane North NAD 83 (ft).
4. Vertical Datum: NAVD 88 (ft).

Jun 21, 2006 2:55pm hlevasseur K:\Jobs\000029-GASCO\00002902\000002902-153.dwg FIG 2

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Figure 2
Proposed Regulated Navigation Area
NW Natural "Gasco" Site